

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
ALEXANDER E. JONES,)	Case No. 22-33553 (CML)
Debtor.)	Re: ECF No. 38
)	

CERTIFICATE OF COUNSEL

The undersigned counsel for Neil Heslin and Scarlett Lewis (the “Texas Post-Trial Plaintiffs”) and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach and Robert Parker (the “Connecticut Plaintiffs” and, together with the Texas Post-Trial Plaintiffs, the “Sandy Hook Post-Trial Families”) certifies as follows:

1. On December 12, 2022, the Sandy Hook Post-Trial Families filed the *Emergency Motion of the Sandy Hook Post-Trial Families for Relief from the Automatic Stay* [ECF. No. 38] (the “Lift Stay Motion”) with the United States Bankruptcy Court for the Southern District of Texas (the “Court”). The Lift Stay Motion requests emergency relief by December 16, 2022 and provides notice that if the Court considers the Lift Stay Motion on an emergency basis, as requested: (i) parties will have less than 21 days to respond to the Lift Stay Motion; and (ii) parties who object to the relief requested in the Lift Stay Motion or who believe that emergency consideration of the Lift Stay Motion is not warranted should file an immediate response. *See* Lift Stay Motion at 1. The Lift Stay Motion was served electronically on all parties registered to receive electronic notice of filings in the above captioned chapter 11 case (the “Chapter 11 Case”) via the Court’s ECF notification system, and via email service.

2. On December 12, 2022, the Sandy Hook Post-Trial Families also filed with the Court the *Notice of Hearing* [ECF No. 39] (the “Notice of Hearing”) in respect of the Lift Stay Motion, which notice was served electronically on all parties registered to receive electronic notice of filings in the Chapter 11 Case via the Court’s ECF notification system, and via email service. As indicated in the Notice of Hearing, the Lift Stay Motion was scheduled to be heard on Friday, December 16, 2022, at 1:00 p.m. (prevailing Central Time).

3. On December 14, 2022, the Sandy Hook Post-Trial Families filed with the Court the *Notice of Reset Hearing* [ECF No. 49] (the “Notice of Reset Hearing”) with respect to the Lift Stay Motion, which was served electronically on all parties registered to receive electronic notice of filings in the Chapter 11 Case via the Court’s ECF notification system, and via email service. The Notice of Reset Hearing provides notice that the hearing on the Lift Stay Motion previously set for December 16, 2022, at 1:00 p.m. (prevailing Central Time), has been reset to **December 19, 2022 at 3:00 p.m. (prevailing Central Time)**.

4. Following the filing of the Lift Stay Motion, counsel for the Sandy Hook Post-Trial Families and Alexander E. Jones, the debtor in possession in this Chapter 11 Case (the “Debtor”) engaged in negotiations regarding the Lift Stay Motion and related issues, and reached an agreement in respect of the same. Such agreement among the Sandy Hook Post-Trial Families, the Debtor and Free Speech Systems LLC is reflected in the attached proposed *Agreed Order Modifying the Automatic Stay* (the “Agreed Proposed Order”).

5. No objections to the Lift Stay Motion were filed on the docket or have been received by the Sandy Hook Post-Trial Families as of the date hereof.

6. Accordingly, the Sandy Hook Post-Trial Families respectfully request that the Court enter the attached Agreed Proposed Order.

Dated: December 19, 2022

Respectfully submitted,

The Sandy Hook Post-Trial Families

By: /s/ David Zensky

David Zensky

**AKIN GUMP STRAUSS HAUER &
FELD LLP**

Marty L. Brimmage, Jr.

Texas Bar No. 00793386

2300 N. Field Street, Suite 1800

Dallas, Texas 75201

Telephone: (214) 969-2800

Facsimile: (214) 969-4343

Email: mbrimmage@akingump.com

-and-

Ira S. Dizengoff (admitted *pro hac vice*)

David M. Zensky (admitted *pro hac vice*)

Philip C. Dublin (admitted *pro hac vice*)

Sara L. Brauner (admitted *pro hac vice*)

Katherine Porter (admitted *pro hac vice*)

One Bryant Park

New York, NY 10036

Telephone: (212) 872-1000

Facsimile: (212) 872-1002

Email: idizengoff@akingump.com

Email: dzensky@akingump.com

Email: pdublin@akingump.com

Email: sbrauner@akingump.com

Email: kporter@akingump.com

***Co-Counsel to the Sandy Hook Post-
Trial Families***

CERTIFICATE OF SERVICE

I certify that on December 19, 2022, a true and correct copy of the foregoing and the attached exhibit were served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Marty L. Brimmage

Marty L. Brimmage, Jr.